

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

IN THE MATTER OF:)	
)	
MICHAEL A. HANCOCK and)	
MICHELLE L. HANCOCK,)	CHAPTER 7 CASE NO.:
)	18-41804-EJC
DEBTORS.)	

TRUSTEE'S APPLICATION TO EMPLOY REAL ESTATE AGENT/BROKER

**TO: THE HONORABLE EDWARD J. COLEMAN, III, JUDGE, UNITED STATES
BANKRUPTCY COURT**

Wendy A. Owens, Trustee (Petitioner"), shows the Court the following:

1. Petitioner is the duly qualified and acting trustee of the estate of the above-named debtor.
2. Assets of this case consists of one real properties located in Liberty County, Georgia.
3. In order to market the real property most effectively and, thereby, to liquidate the same for the best and highest price, petitioner has solicited the assistance of Penny Rafferty of Penny Rafferty Realty, Inc. located at 2126 E. Victory Drive, Savannah, Georgia 31404, a licensed real estate agent/broker, who has, on your petitioner's behalf, examined said real property and agreed to advertise said property at her expense, to show said property to interested parties, to represent the estate as seller in connection with the sale of the property, and to advise your petitioner with respect to obtaining the highest and best offers available in the present market for said property.
4. Based on the foregoing, your applicant desires to employ Penny Rafferty as a real estate agent/broker to procure and submit to petitioner offers to purchase the real property. In consideration for said services, Penny Rafferty will receive as commission, upon consummation of the any such sale, a real estate commission in an amount equal to SIX PERCENT (6.0%) of the purchase price.
5. The real estate agent/broker whom petitioner proposes to employ has been informed and understands that no sale can be consummated until after notice and a hearing.
6. Petitioner is informed and believes and, therefore, alleges the employment of Penny Rafferty on the terms and conditions provided for herein, is in the best interest of the estate.
7. Petitioner is satisfied that the Declaration from Penny Rafferty that she is a disinterested person within the meaning of 11 U.S.C. Section 101.

8. Said real estate agent/broker is aware of the provisions of 11 U.S.C. Section 328(a) and has agreed, notwithstanding the terms and conditions of employment herein set forth, that the Court may allow compensation different from the compensation provided herein if such terms and conditions prove to have been improvident in light of developments unanticipated at the time of the fixing of such terms and conditions.

WHEREFORE, Petitioner requests authorization to employ Penny Rafferty of Penny Rafferty Realty, as real estate agent/broker on the terms and conditions set forth herein.

Dated this the 31st day of January, 2019.

/s/ Wendy A. Owens
WENDY A. OWENS, Trustee/Petitioner

Wendy A. Owens
GA BAR No. 557809
Chapter 7 Trustee
PO Box 8846
Savannah, GA 31412
trustee@coastalempirelaw.com

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AFFIDAVIT OF REAL ESTATE PROFESSIONAL PURSUANT TO RULE 2014

Before the undersigned Notary Public came and appeared Penny Rafferty who under oath, deposes and says as follows:

1. I am a real estate professional with the real estate office of Penny Rafferty Realty located at 2126 E. Victory Drive, Savannah, Georgia 31404.
2. I am duly licensed to sell real estate in the state of Georgia.
3. I submit this Affidavit in support of the Application to Employ a Real Estate Professional to represent the Trustee in her official capacity in the instant bankruptcy case.
4. I am familiar with the Trustee's Application and the property described therein, and believe that I am qualified to represent the Trustee and the estate in connection with the marketing of said property. I have agreed to accept employment on the terms and conditions set forth in the Trustee's Application.
5. I have the stated connection to the individuals, entities and parties listed below:

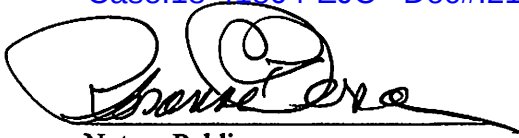
a) The Debtor:	None
b) The Debtor's Counsel:	None
c) Creditors of the Debtor:	None
d) The U.S. Trustee:	None
e) Persons Employed by the U.S. Trustee's Office:	None
f) The Chapter 7 Trustee:	None
6. To the best of my knowledge, information and belief, neither my office nor any member thereof:
 - a) Holds any interest adverse to the within estate in the matters upon which it is to be engaged;
 - b) Has any business interest in Debtor;
 - c) Have a pre-petition or other claim against the bankruptcy estate.

I declare under the penalty of perjury that the forgoing is true and correct.

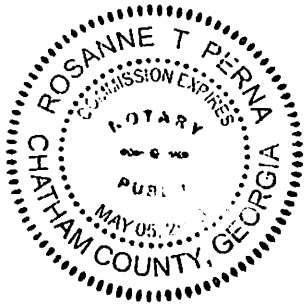


Penny Rafferty
Penny Rafferty Realty

Sworn to and subscribed before me
This 30th day of January 2019



Notary Public



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CERTIFICATE OF SERVICE

This is to certify that I have this date served the foregoing, **APPLICATION OF TRUSTEE TO EMPLOY REAL ESTATE AGENT/BROKER**, through CM/ECF or by depositing same in the United States Mail with sufficient postage affixed thereon, to those addressed below:

Barbara B. Braziel
6555 Abercorn Street, Suite 105
Savannah, GA 31405

Michael A. Hancock
60 Evergreen Oak Drive
Richmond Hill, GA 31324

Michelle L. Hancock
60 Evergreen Oak Drive
Savannah, Georgia 31324

Matthew E. Mills
Assistant U.S. Trustee
Office of the U.S. Trustee
Johnson Square Business Center
2 East Bryan Street, Ste. 725
Savannah, GA 31401

This the 31st day of January, 2019

/s/ Wendy A. Owens
WENDY A. OWENS, Trustee/Petitioner

Prepared by:
Wendy A. Owens, Esq.
GA BAR No. 557809
Chapter 7 Trustee
P.O. Box 8846
Savannah, GA 31412
912-239-9888
trustee@coastalempirelaw.com